

A previous reply comment has stated that numerous amateur radio operators have filed adverse comments concerning this proceeding, but no amateurs in the current trial areas where BPL technology is being "tested" has reported any interference with their own operations. This statement is clearly intended to imply that BPL technology does not create any harmful interference. However, recent field observations made by the American Radio Relay League in several northeastern test areas, and recorded on a video tape that is available to the Commission, demonstrate quite the opposite.

The Commission should use every effort to make, collect, and objectively evaluate exhaustive field and laboratory observations and data before reaching any conclusion as to what regulations are necessary to regulate BPL service if it is deployed. To approve its widespread deployment without regulations adequate to fully protect the many current primary users of frequencies in the 2MHz to 80MHz spectrum from harmful interference would be an abdication of the Commission's obligation to protect the public interest. A comprehensive, objective, and independent technical evaluation of the adverse impact of BPL technology (including a reassessment of current Part 97 regulations that permit a certain level of unintended radiation from BPL service) is an absolute necessity in this matter. There is potentially too much at risk to the many primary users of frequencies between 2MHz and 80MHz to do anything less than this.

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